



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

**Gulf Oil Limited Partnership
Cumberland County
South Portland, Maine
A-390-71-N-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Gulf Oil Limited Partnership (Gulf) was issued Air Emission License A-390-71-M-R on November 30, 2012, for the operation of emission sources associated with their petroleum storage and distribution facility.

Gulf has requested a minor revision to their license to modify the petroleum truck loading rack at the Gulf terminal to include two additional loading arms, to allow for greater operational flexibility of No. 2 heating oil loading.

The equipment addressed in this license amendment is located at 175 Front Street, South Portland, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Process Equipment

<u>Equipment</u>	<u>When Loading...</u>	<u>Production Rate</u>	<u>Date of Manufacture and Installation</u>
Loading Rack	Gasoline	7,600 gal/min	1995
	Distillate Fuel	460 MMgal/yr	1950

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. **AMENDMENT DESCRIPTION**

Petroleum products handled at this facility are received by ship and by truck at the terminal's loading rack and transferred via product piping to the terminal's tank farm. Final distribution of product is principally conducted at the terminal's truck loading rack. The facility's current loading rack configuration includes five lanes with a total of six gasoline loading arms and five distillate bottom loading arms. Gulf is proposing to add two distillate bottom loading arms, for a total of seven distillate bottom loading arms. The modification does not affect the gasoline loading activities as currently licensed. There will be no change to the licensed loading rack production rate or to the licensed maximum annual throughput amounts for any of the petroleum products handled at the facility.

III. **BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Control of VOC Emissions

For distillate loading, Gulf controls the vapors displaced for distillate bottom loading positions when the tanker truck being filled with distillate oil contains gasoline vapors from a previous gasoline load. The facility uses a McGill Carbon Adsorption/Absorption Vapor Recovery Unit (VRU) to capture and control VOC emissions during gasoline-related loading events. For the purposes of this license, gasoline-related loading events include the loading/unloading of gasoline and the loading of a delivery tank truck which has loaded gasoline on the immediately previous load.

Literature and air emission licenses for other, similar sources consistently include vapor combustion or vapor recovery units such as Gulf's McGill unit as BPT/BACT for VOC emissions from gasoline-related loading events and no add-on controls for oil (in this case, distillate fuel) loading.

The Department finds the use of the VRU to capture and control VOC emissions during gasoline-related loading events to be BACT for VOC emissions control from the two new distillate loading arms.

Gulf has not requested any change to the license limits for VOC emissions from the facility, and the facility shall continue to comply with all limitations and conditions of their air emission license.

C. Annual Emissions

The facility's annual emissions are not being reviewed with this amendment and shall remain as currently licensed.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-390-71-N-M subject to the conditions found in Air Emission License A-390-71-M-R.

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Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

There are no amended or additional license conditions as a result of this license amendment.

DONE AND DATED IN AUGUSTA, MAINE THIS 19 DAY OF October, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Mark Allen Robert Cove for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-390-71-M-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 26, 2016

Date of application acceptance: September 30, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

